

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

RECEIVED

JUL 31 2017 *YS*

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Job E. AYALA

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

CPD officer Corona

CPD officer Delaney

CPD officer Houlihan

CPD officer IZA

CPD officer Macniff

CPD officer Konior

CPD officer Brown

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

1:17-cv-05621

Case No.  
(To be)

Judge Rebecca R. Pallmeyer  
Magistrate Judge Susan E. Cox  
PC2

CHECK ONE ONLY:

AMENDED COMPLAINT

X

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

\_\_\_\_\_

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

\_\_\_\_\_

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

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**I. Plaintiff(s):**

- A. Name: Job E. AYALA
- B. List all aliases: \_\_\_\_\_
- C. Prisoner identification number: B-34791
- D. Place of present confinement: Danville Correctional Center
- E. Address: 3820 E. Main St. Danville, IL. 61834

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: Corona  
Title: CPD officer # 3331  
Place of Employment: Chicago Police Department
- B. Defendant: Delaney  
Title: CPD officer # 4024  
Place of Employment: Chgo Police Department
- C. Defendant: Macniff  
Title: CPD officer # 11549  
Place of Employment: Chicago Police Department

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

- D. Defendant: Houlihan  
Title: CPD officer # 4837  
Place of Employment: Chicago Police Department
- E. Defendant: Brown  
Title: CPD officer # 20982  
Place of Employment: Chicago Police Department
- F. Defendant: Konior  
Title: CPD officer # 14328  
Place of Employment: Chicago Police Department
- G. Defendant: IZA  
Title: CPD officer # 12649  
Place of Employment: Chicago Police Department



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**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: NONE
- B. Approximate date of filing lawsuit: NONE
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: NONE
- D. List all defendants: NONE
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): NONE
- F. Name of judge to whom case was assigned: NONE
- G. Basic claim made: NONE
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): NONE
- I. Approximate date of disposition: NONE

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

#### IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

1. on Oct 3<sup>rd</sup>, 2015 approx. 10:30 pm at 2938 W.  
Fullerton ave Chicago, IL 60647, I was walking  
out of the Two Way Bar up to a Taxi that I  
had called and was waiting for me parked  
at the curb in front of the bar.
2. when suddenly I was grabbed from behind by  
two individuals. AS I turned around and put  
my hands up defensively, I was physically  
assaulted and attacked.
3. I was thrown to the ground and pummeled  
and stomped about the head and ribs by  
Seven individuals,
4. In the process causing me to loose conscious-  
ness and suffer head trauma, concussion, and  
three broken ribs.
5. Not until after I was handcuffed did these  
individuals announce themselves as being  
chicago police officers.



[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

6. Officers involved: Corona # 3331, Delaney # 4024  
Macniff # 11549, Haulihan # 4837, Brown # 20982  
IZA # 12649, Konior # 14328
7. These officers have a history of misconduct  
and excessive force. (I have complaint history  
records)
8. Only after subduing me did they announce  
their office
9. They never read me my miranda rights and  
never told me I was under arrest.
10. They refused to give me medical attention  
even after several repeated requests.
11. Not until I was in lock up for several  
hours, did other officers come along, in  
charge of transfers, and offered me medical  
attention.
12. Then and only then was I taken to the  
hospital for proper medical attention. (I have  
medical records)
13. I have eight witnesses to the  
incident. They are willing to testify in  
court. continued on next page →

14. I have thier names, addresse s, age, phone numbers, and occupation. These are the witnesses that were present during the incident that occured at the time of my arrest
15. Your Honor I would like to send you a copy of the witnesses information, but I fear that the officers will obtain that information.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**V. Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I am seeking -

Compensatory Damages = \$250,000.00  
Punitive Damages = \$250,000.00  
All officers to get fired.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

**CERTIFICATION**

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 20<sup>th</sup> day of July, 2017

Job E. Ayala

(Signature of plaintiff or plaintiffs)

Job E. AYALA

(Print name)

B-34791

(I.D. Number)

3820 E. Main St.

Danville, IL. 61834

(Address)



JOB A/HEN 321111  
3820 E. Main St.

Danville, IL. 61834

Legal  
Mail

Legal

Mail



07/31/2017-27

Office of  
Clerk of the U.S. District Court  
219 S. Dearborn St.  
Chgo, IL. 60604

1:17-cv-05621  
Judge Rebecca R. Pallmeyer  
Magistrate Judge Susan E. Cox  
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*ll*

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

IMMATE  
CORRESPONDENCE

neopost  
07/29/2017  
US POSTAGE



Legal

Mail